

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JERRY LEON DEES, JR.,

Plaintiff,

V.

**HYUNDAI MOTOR MANUFACTURING
ALABAMA, LLC, and HYUNDAI MOTOR
AMERICA, INC.,**

Defendants.

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**CIVIL ACTION NO.:
2:07-cv-00306-MHT-CSC**

**DEFENDANTS' SUPPLEMENTAL DISCLOSURE RELATED TO
FAMILIAL RELATIONSHIP BETWEEN POTENTIAL WITNESSES
AND THE TRIAL JUDGE**

Defendants Hyundai Motor Manufacturing Alabama, LLC (“HMMA”) and Hyundai Motor America, Inc. (“HMA”) (collectively “Defendants”), through the undersigned counsel, file this Supplemental Disclosure related to the Familial Relationship between potential witness and the trial judge. Defendants further state:

1. On March 31, 2008, in connection with pre-trial filings, Defendants filed Defendants' Disclosure of related to familial relationship between potential witness and the trial judge. (Doc. 136).

2. That pleading states that, during the course of trial preparation, Defendants' counsel learned from Mr. Greg Kimble, a potential witness, that according to Mr. Kimble, he and the Honorable Myron H. Thompson are second cousins who share a common great, great grandmother. (Id. at para. 3-7).

3. On the morning of April 1, 2008, the Court's Judicial Clerk called Defendants' counsel (Mr. Scofield), and requested that additional information regarding this alleged familial relationship be filed with the Court before the end of the business day.

4. In response to this request, Mr. Scofield contacted Mr. Kimble by telephone. In response to Mr. Scofield's inquiry, Mr. Kimble has provided the following additional information which Defendants now provide to the Court:

- Greg Kimble is the son of Mary (Thomas) Kimble.
- Ms. Kimble's Great Uncle is Mr. Will Glanton.
- Mr. Glanton is a Grandfather to the Trial Judge.

5. In conclusion, Defendants wish to re-emphasize that this disclosure (and supplementation thereto) is made out of an abundance of caution. Defendants do not suggest, based on the information presently available to them, that: (a) Mr. Kimble will be considered a "material witness" in this proceeding, and/or (b) that Mr. Kimble and the Trial Judge sit within a degree of relationship as defined by the applicable Judicial Canon.

Respectfully submitted,

/s/ J. Trent Scofield
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Pro Hac Vice Granted 05/15/07

Attorneys for Defendants Hyundai Motor
Manufacturing Alabama, LLC and
Hyundai Motor America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April, 2008, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: W. Perry Hall, Vincent F. Kilborn, III, David Allen McDonald, Jeffrey Rayborn Sport, Timothy A. Palmer, T. Scott Kelly, and Matthew K. Johnson.

/s/ J. Trent Scofield

OF COUNSEL

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